

**James E. Franklin**

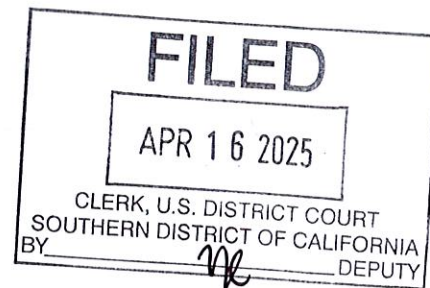
Defendant, Pro Se

1212 H Street, SPC #125

Ramona, CA 92065

(720) 771-0140

[jayvonfrank@gmail.com](mailto:jayvonfrank@gmail.com)



April 9, 2025

**Clerk of Court**

U.S. District Court

Southern District of California

333 West Broadway, Suite 420

San Diego, CA 92101

**Re: Supplemental Filing in Support of Rule 60(b) Motion**

**Case No.:** 02cv0084-DMS (RBB)

Dear Clerk of Court:

Please find enclosed for filing the following supplemental materials in support of my previously filed **Motion for Relief from Final Judgment** under Rule 60(b):

- **Supplemental Declaration of James E. Franklin**
- **Exhibit K: Chase Bank Closure Letter**

These materials provide additional evidence of ongoing reputational and economic harm stemming from the underlying judgment. Please associate them with the Rule 60(b) motion filed and served on April 5, 2025.

Respectfully,

**/s/ James E. Franklin**

**James E. Franklin, Pro Se**

# EXHIBIT K

Supplemental Declaration of

James E. Franklin

Re: Financial Institution Blacklisting and  
Reputational Harm

Dated: April 8, 2025

**IN THE UNITED STATES DISTRICT COURT**  
For the Southern District of California

**SECURITIES AND EXCHANGE  
COMMISSION**  
**Plaintiff,**

**V.**

**Case No. 02cv84 IEG (RBB)**

**JAMES E. FRANKLIN,**  
**Defendant.**

## DECLARATION OF JAMES E. FRANKLIN

1. I, James E. Franklin, declare under penalty of perjury as follows:
2. I feel compelled to shed light on the deeply rooted business prejudice that has severely impacted my life. This discrimination has not only hindered my professional growth—with hundreds of failed job applications and thousands of unsuccessful attempts to raise capital—but also led to the complete shutdown of my personal and business financial tools, culminating in moments so overwhelming that I've questioned whether continuing this fight is worth it.
3. On January 14, 2014, Citibank abruptly closed both my business checking account—with over \$4,500 on deposit—and the personal account of my business partner, a decorated veteran and prolific inventor. I had full signatory authority and power of attorney on his account. These closures occurred without prior notice, explanation, or any allegation of wrongdoing.
4. Defendant also submits a letter from JPMorgan Chase confirming the involuntary closure of business accounts associated with Petitioner, consistent with the reputational exclusion described in Exhibit K.
5. Citibank also removed me as an authorized user from a credit card account held by my former partner, and in 2021, I was again flagged and removed from another account where

I was listed only as an additional signer. Each of these removals occurred without cause.

6. At the time of the initial closures in 2014, my credit score was in the high 600s, and it rose to 794 later that same year—demonstrating responsible credit behavior. Despite this, I was and remain excluded from core financial systems, with no notice or process for appeal.

7. I am a father, a family man, and someone who takes his responsibilities seriously. What I have experienced as a result of the SEC judgment is not simply reputational harm—it is permanent economic exclusion and loss of opportunity, perpetuated by government-maintained records and indexing of my name. There has been no end point, no mechanism for relief, and no way to move on.

Executed on April 9<sup>th</sup>, 2025

At: Sarasota, FL



James E. Franklin, Declarant

1212 H Street, SPC #125  
Ramona, CA 92065



**JP Morgan Chase Bank, N.A.**  
**Chase Operating Loss Prevention**

01/15/2014

SOLAR CHIMPS, INC.  
3510 SANTORO WAY  
SAN DIEGO CA United States 92130-1024

Re: Account(s) ending in : 2317,2550  
Reference Case Number: 5307875

Dear SOLAR CHIMPS, INC.:

A review of our records indicates that we are unable to retain your above-referenced account(s) (the "Accounts") at JPMorgan Chase Bank, N.A. (the "Bank").

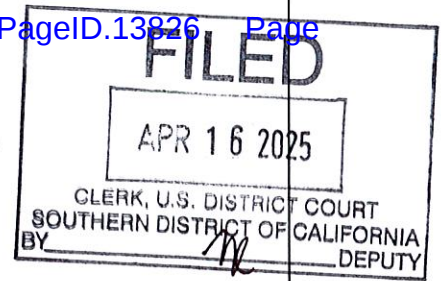
The terms and conditions governing the Accounts ("Account Rules") provide that the Bank may close your Accounts at any time. Although the Account Rules do not require the Bank to provide you with advance notice of the termination of the Accounts, as a courtesy, please be advised that the Accounts will be terminated and closed after the close of business on 03/11/2014 . Any items presented for payment on the Accounts and not paid prior to termination will be returned unpaid. If the Accounts were covered by Overdraft Protection, as that term is defined in the Account Rules, such Overdraft Protection will terminate with respect to the Accounts on the Termination Date.

Please do not deposit checks to the Accounts within five (5) business days of the Termination Date or any earlier date that you close the Accounts. Please arrange to cause any Automated Clearing House or ACH deposits or transfers to the Accounts to be terminated prior to closure. Provided that no checks have been deposited to your Accounts within the five (5) business day period before the Accounts are closed and no deposits of any kind have been made to your Accounts within a two (2) business day period before such closure, upon closure the Bank will, at your risk, mail to you at the address set forth above a check for the balance of your Accounts, less any service charges assessed to the Accounts. If deposits are made to the Accounts prior to closure inconsistent with the foregoing, the Bank will mail your check as soon as reasonably possible following closure of the Accounts. If you wish to make other arrangements for receipt of any funds remaining in the Accounts or if you have questions, please contact 1-877-691-8086 OPTION-NUMBER-1.

Notwithstanding the Bank's intent to allow the Accounts to remain open until as set forth above, the Bank reserves the right to close the Accounts earlier, at any time, for any reason, without notice.

Sincerely,

Chase Operating Loss Prevention



IN THE UNITED STATES DISTRICT COURT  
For the Southern District of California

SECURITIES AND EXCHANGE  
COMMISSION  
Plaintiff,

v.

JAMES E. FRANKLIN,  
Defendant.

Case No. 02cv84 IEG (RBB)

CERTIFICATE OF SERVICE

I, James E. Franklin, declare that on April 9, 2025, I served the attached **Supplemental Declaration and Exhibit K** by placing a true and correct copy in the U.S. Mail, first-class postage prepaid, addressed to:

**Clerk of Court**

U.S. District Court, Southern District of California  
333 West Broadway, Suite 420  
San Diego, CA 92101

**U.S. Securities and Exchange Commission**

Attn: Regional Director  
444 South Flower Street, Suite 900  
Los Angeles, CA 90071

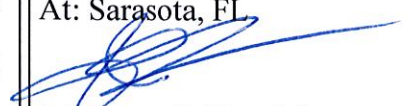
**U.S. Department of Justice – Civil Division**

1100 L Street NW, Room 11012  
Washington, DC 20005

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 9, 2025

At: Sarasota, FL

  
/s/ **James E. Franklin**  
**James E. Franklin, Pro Se**



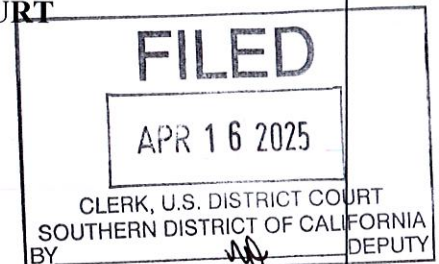
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SECURITIES AND EXCHANGE  
COMMISSION  
Plaintiff,

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Case No. 02cv84 IEG (RBB)



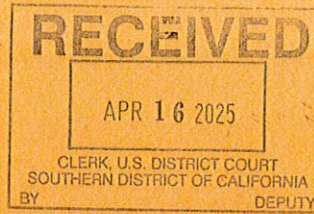
AMENDED EXHIBIT LIST

Filed in Support of Motion for Relief from Final Judgment

Including Supplemental Filing Submitted April 8, 2025

Exhibit	Description
A	Exhibit 371 – Summary Chart used by SEC summary witness (Robert Lowry)
B	Exhibit 89 – Bloomberg trading volume data showing market conditions
C	Raabe Immunity Order – Government’s mid-trial grant of immunity to co-defendant
D	Excerpt from Appellant’s Brief – Ninth Circuit Case No. 06-55357 (Pages i–ii, 1–7, 17–21, 29, 34–36, 38–39, 44)
E	Declaration of James E. Franklin (attached)
F	March 11, 2004 letter from Stephan Jan Meyers to SEC Director of Enforcement
G	June 29, 2007 follow-up letter and supplemental memo from Meyers to SEC Commissioners
H	April 28, 2004 “Un-Fairy Tale” investor letter by Meyers detailing misconduct
I	Google search results & Declaration of Harm related to ongoing reputational damage
J	Declaration of Sam Wolanyk affirming Mr. Franklin’s lack of editorial control, compensation, or coordination with RedHotStocks.com
K	Supplemental Declaration of James E. Franklin and Attached Chase Bank Closure Letter (Filed April 8, 2025)

J. Franklin  
1212 H. Street #125  
Ramona, CA 92065



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Southern District California  
333 W. Broadway Ste. 420  
San Diego, CA

92101

